

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

BETHANY DITZLER	:	
1329 Jerusalem Chapel Road,	:	
Churchville, VA 24421	:	CIVIL ACTION - MEDICAL
Plaintiff	:	
v.	:	
	:	
PINNACLEHEALTH OBSTETRICS	:	
AND GYNECOLOGY SPECIALISTS	:	PROFESSIONAL LIABILITY ACTION
100 South 2 nd Street, Suite 4A	:	
Harrisburg, PA 17101	:	
and	:	
PINNACLEHEALTH MEDICAL	:	
SERVICES	:	
100 South 2 nd Street, Suite 4A	:	
Harrisburg, PA 17101	:	
and	:	
UPMC PINNACLE HARRISBURG	:	
100 South 2 nd Street, Suite 4A	:	
Harrisburg, PA 17101	:	
and	:	
HARRISBURG HOSPITAL	:	
100 South 2 nd Street, Suite 4A	:	
Harrisburg, PA 17101	:	
and	:	
PINNACLEHEALTH	:	
100 South 2 nd Street, Suite 4A	:	
Harrisburg, PA 17101	:	
and	:	
PINNACLEHEALTH HOSPITALS, INC.	:	
100 South 2 nd Street, Suite 4A	:	
Harrisburg, PA 17101	:	
and	:	
PINNACLEHEALTH HARRISBURG	:	
HOSPITAL	:	
100 South 2 nd Street, Suite 4A	:	
Harrisburg, PA 17101	:	
and	:	
HANFORD NDLOVU	:	
100 South 2 nd Street, Suite 4A	:	
Harrisburg, PA 17101	:	
and	:	
BEVERLY A. HALL NDLOVU	:	
100 South 2 nd Street, Suite 4A	:	
Harrisburg, PA 17101	:	

and
LEE BLECHER
14 Canfield Ct.
Potomac, MD 20854

Defendants :

CERTIFICATE OF MERIT AS TO
BEVERLY A. HALL NDLOVU

I, Thomas F. Sacchetta, Esquire, certify that:

X An appropriate licensed professional has supplied a written statement to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by this defendant in the treatment, practice or work that is the subject of the complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

OR

X the claim that this defendant deviated from an acceptable professional standard is based solely on allegations that other licensed professionals for whom this defendant is responsible deviated from an acceptable professional standard and an appropriate licensed professional has supplied a written statement to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by the other licensed professionals in the treatment, practice or work that is the subject of the complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

OR

☐ expert testimony of an appropriate licensed professional is unnecessary for prosecution of the claim against this defendant.

/s/Thomas F. Sacchetta

THOMAS F. SACCHETTA, ESQUIRE

Attorney for plaintiff